UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)		
)		
V.)	CRIMINAL NO.	05-10250-NG
)		
DANIELLE VANESSA PAPPARGERIS)		

JOINT MOTION OF THE PARTIES TO CONTINUE SENTENCING

The parties jointly move that the sentencing in this matter, currently scheduled for October 25, 2006, be continued for 90 days, until the middle or end of January 2007. As grounds therefor, the parties state that the defendant pled guilty to an information pursuant to a plea agreement that contains a cooperation provision. A pre-plea PSR is now being prepared in the case in which the Ms. Pappargeris is cooperating, but it is not yet know whether a plea or trial will result. Accordingly, the government is not yet in a position to accurately describe the extent and helpfulness of the defendant's cooperation, and believes, as does the defendant, that the sentencing in this case should be continued until the extent of the defendant's cooperation is more fully developed.

DANIELLE VANESSA PAPPARGERIS By Her Attorney MICHAEL J. SULLIVAN United States Attorney

By:

/s/ Walter H. Underhill WALTER H. UNDERHILL, ESQ. Attorney for Defendant (617) 523-5858 /s/ Timothy Q. Feeley TIMOTHY Q. FEELEY Assistant U.S. Attorney (617) 748-3172

October 19, 2006